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 Sunset Commercial LLC*

**UNITED STATES DISTRICT COURT  
 DISTRICT OF NEVADA**

SUNSET COMMERCIAL LLC, a Nevada  
 Limited Liability Company,

Plaintiff,

vs.

BAYER CROPSCIENCE, INC., a New York  
 Corporation; MONTROSE CHEMICAL  
 CORPORATION OF CALIFORNIA, a  
 Delaware Corporation; ATLANTIC  
 RICHFIELD COMPANY, a Delaware  
 Corporation; OLIN CORPORATION, a  
 Virginia Corporation, TITANIUM METALS  
 CORPORATION, a Delaware Corporation;  
 NL INDUSTRIES, INC., a New Jersey  
 Corporation; LE PETOMANE XXVII, INC.,  
 an Illinois Corporation, in its representative  
 capacity as the NEVADA  
 ENVIRONMENTAL RESPONSE TRUST  
 TRUSTEE; and the UNITED STATES OF  
 AMERICA.

Defendants.

Case No. 2:23-CV-02081-GMN-BNW

**MOTION TO EXTEND DEADLINE FOR  
 PLAINTIFF TO RESPOND TO MOTION  
 TO AMEND ANSWER TO AMENDED  
 COMPLAINT**

Plaintiff Sunset Commercial LLC (“Sunset” or “Plaintiff”), by and through its undersigned  
 counsel, hereby requests an extension of time for the parties to file a response to Defendant Montrose  
 Chemical Corporation of California’s (“Montrose’s”) Motion to Amend [58] Answer to Amended  
 Complaint (ECF No. 130) (“Motion”) in this matter. In support of this request, Sunset states as

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1 follows:

- 2 1. Sunset's current deadline to file a response to Montrose's Motion is June 16, 2025.
- 3 2. Sunset has been engaged in productive settlement conversations with Montrose.
- 4 3. Sunset and Montrose have reached an agreement in principle for settlement.
- 5 4. Sunset believes an extension by this Court of the time within which Sunset shall
- 6 response to the Motion from June 16, 2025, to August 1, 2025, would conserve party and judicial
- 7 resources, and allow the two parties to finalize their settlement.
- 8 5. Montrose has indicated it does not oppose this Motion.
- 9 6. This would be the first extension of this deadline and is made in good faith and not for
- 10 purposes of delay. *See* LR IA 6-1(a).

11 In light of the foregoing circumstances, Sunset requests that the Court enter an order extending  
12 the deadline for Sunset to response to the Motion to and including August 1, 2025.

13 DATED: June 16, 2025.

PARSONS BEHLE & LATIMER

14  
15 By: /s/ Ashley C. Nikkel  
16 Richard J. Angell, Nevada Bar ID 9339  
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22 *Attorneys for Plaintiff*  
23 *Sunset Commercial LLC*

24 **ORDER**

25 **IT IS SO ORDERED.**

26   
27 UNITED STATES MAGISTRATE JUDGE

28 Dated: 6/17/2025

**CERTIFICATE OF SERVICE**

I hereby certify that I am an employee of the law firm of Parsons Behle & Latimer and that on the 16th day of June, 2025, I filed a true and correct copy of the foregoing document, **MOTION TO EXTEND DEADLINE FOR PLAINTIFF TO RESPOND TO MOTION TO AMEND ANSWER TO AMENDED COMPLAINT**, with the Clerk through the Court's CM/ECF system, which sent electronic notification to all parties on the e-service list.

/s/ Nancy A. Prout

Employee of Parsons Behle & Latimer